

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

JILL HINES, et al.,

Plaintiffs,

v.

ALEX STAMOS, et al.,

Defendants.

Case No. 3:23-cv-00571-TAD-KDM

**PLAINTIFFS' SECOND CONSENT MOTION FOR EXTENSION OF TIME TO FILE
RESPONSES TO DEFENDANTS' MOTIONS TO DISMISS AND TO COMPEL
ARBITRATION AND TO FILE FIRST AMENDED COMPLAINT AS OF RIGHT**

Pursuant to the Federal Rules of Civil Procedure and this Court's Local Rules, Plaintiffs Jill Hines and Jim Hoft respectfully request the Court's leave for a second extension of time of 21 days, to October 17, 2023, in which to file their response to Defendants' "Joint Motion to Compel Individual Arbitration, Dismiss Plaintiffs' Class Claims, and Stay All Proceedings, or Alternatively To Transfer Venue Under 28 U.S.C. § 1404," Doc. 69 ("Joint Motion to Compel Arbitration"); to file their response to Defendants' Joint Motion to Dismiss, Doc. 70; and to file their First Amended Complaint as of right under Rule 15(a)(1)(B) of the Federal Rules of Civil Procedure. In support, Plaintiffs state as follows:

On August 14, 2023, Defendants filed their Joint Motion to Compel Arbitration and Joint Motion to Dismiss. Docs. 69, 70. After one 21-day extension, Plaintiffs' responses to both these motions are currently due on September 26, 2023. In connection with the preparation of their responses to these two motions, Plaintiffs are also likely to file a First Amended Complaint as of

right, pursuant to Rule 15(a)(1)(B) of the Federal Rules of Civil Procedure, which is also currently due on September 26, 2023. Due to the length and complexity of the motions and the preparation of the amended pleading, and the significant press of additional business, Plaintiffs respectfully request a second extension of 21 days, to October 17, 2023, in which to file their responses to the Joint Motion to Compel Arbitration and to their Joint Motion to Dismiss, Docs. 69, 70, and in which to file their First Amended Complaint as of right under Rule 15(a)(1)(B). Plaintiffs have consulted with counsel for Defendants about this request for extension, and Defendants have consented to this request.

CONCLUSION

For these reasons, Plaintiffs respectfully request that this Court grant them a second extension of time of 21 days, to October 17, 2023, in which to file their Response to Defendants' Joint Motion to Compel Arbitration, Doc. 69; to file their Response to Defendants' Joint Motion to Dismiss, Doc. 70; and to file their First Amended Complaint as of right under Rule 15(a)(1)(B).

Dated: September 25, 2023

Respectfully submitted,

<p>AMERICA FIRST LEGAL</p> <p><u>/s/ Gene P. Hamilton</u> Gene P. Hamilton, GA Bar No. 516201* Reed D. Rubinstein, DC Bar No. 400153* Nicholas R. Barry, TN Bar No. 031963* Michael Ding, DC Bar No. 1027252* Juli Z. Haller, DC Bar No. 466921* James K. Rogers, AZ Bar No. 027287* Andrew J. Block, VA Bar No. 91537* 611 Pennsylvania Ave SE #231 Washington, DC 20003 (202) 964-3721 gene.hamilton@aflegal.org reed.rubinstein@aflegal.org nicholas.bary@aflegal.org michel.ding@aflegal.org juli.haller@aflegal.org james.rogers@aflegal.org andrew.block@aflegal.org</p>	<p>JAMES OTIS LAW GROUP, LLC</p> <p><u>/s/ D. John Sauer</u> D. John Sauer, Mo. Bar No. 58721* Justin D. Smith, Mo. Bar No. 63253* 13321 North Outer Forty Road, Suite 300 St. Louis, Missouri 63017 (314) 562-0031 John.Sauer@james-otis.com</p> <p>* admitted <i>pro hac vice</i></p> <p>LANGLEY & PARKS, LLC</p> <p>By: <u>/s/ Julianna P. Parks</u> Julianna P. Parks, Bar Roll No. 30658 4444 Viking Drive, Suite100 Bossier City, Louisiana 71111 (318) 383-6422 Telephone (318) 383-6405 Telefax jparks@languelparks.com</p>
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CERTIFICATE OF SERVICE

I hereby certify that, on September 25, 2023, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case.

/s/ D. John Sauer